

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS**

MEIJER, INC. and MEIJER DISTRIBUTION,  
INC., et al.,

Plaintiffs,

v.

C.A. No. 19-md-02878 (NMG)

RANBAXY, INC. and SUN  
PHARMACEUTICAL INDUSTRIES, LTD., et  
al.,

Defendants.

**DECLARATION OF CHARLES FIDLER  
IN SUPPORT OF NONPARTY ASTRAZENECA PHARMACEUTICALS LP'S  
SUBMISSIONS IN OPPOSITION TO MOTIONS TO COMPEL**

I, Charles Fidler, hereby declare as follows pursuant to 28 U.S.C. § 1746:

1. I am the Director of Strategic Alignment within the Market Access Strategic Pricing and Operations group ("MASPO") with AstraZeneca Pharmaceuticals LP ("AstraZeneca").

2. In this role, I am responsible for maintaining AstraZeneca's end-to-end revenue management database, which AstraZeneca uses to manage aspects of its business, including to maintain and track information about its financial agreements with customers and other entities, to realize revenue that it generates under those agreements, and to trigger payments required by those agreements.

3. MASPO uses the revenue management database to perform a number of functions, including to make information available to AstraZeneca's independent auditors, as well as to perform financial testing and monitoring, and to produce information that is

disseminated throughout AstraZeneca in support of more than 60 Sarbanes-Oxley internal controls.

4. My team is currently implementing an update to AstraZeneca's revenue management database.

5. AstraZeneca's current revenue management database contains data for the period from 2017 to the present.

6. Data for the period from 2005 through 2016 is stored in a predecessor revenue management database, which has been archived. AstraZeneca does not maintain a user interface to allow employees responsible for operating AstraZeneca's business functions to access and retrieve information from the archived predecessor revenue management database.

7. Because the database architecture of the archived predecessor revenue management database is different from AstraZeneca's current revenue management database, the data must be compiled and manually reviewed for accuracy before it can be relied upon by AstraZeneca's own employees. The process of collection and confirmation requires a great deal of work and must be repeated numerous times to ensure accuracy.

8. In both the current and predecessor revenue management databases, information relating to rebates paid to the States under the Medicaid program is stored separately from information about the other transactions collected for Defendants in this matter. Collecting this type of Medicaid rebate data requires us to search across additional data tables, which greatly increases the total number of relevant data entries and increases both the time necessary for collection and confirmation.

9. AstraZeneca has limited personnel with the knowledge required to conduct these searches and to confirm the accuracy of the resulting data through manual quality control

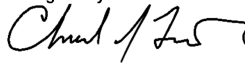
reviews. Conducting the required searches and reviewing the resulting data requires a deep understanding of AstraZeneca's operations and historical performance. As a result, the process of collecting and reviewing this data cannot be delegated to a third-party vendor or to AstraZeneca employees operating without significant oversight from MASPO.

10. Due to our ongoing efforts in this matter to collect the agreed-upon chargeback data and the additional data covered by the Court's November 12 order, AstraZeneca cannot feasibly complete the production of the ordered Medicaid rebate data by the December 10 deadline.

11. I estimate that the earliest AstraZeneca can feasibly produce the ordered Medicaid rebate data is January 15, 2021.

12. I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 30, 2020  
Wilmington, DE

DocuSigned by:  
  
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Charles Fidler